

JS 44 (Rev 06/17)

EGS CIVIL COVER SHEET

5.19-2347

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM)

I. (a) PLAINTIFFS

GINA SNYDER

DEFENDANTS

CBC Transport, LLC and Cirineu Farias

(b) County of Residence of First Listed Plaintiff Philadelphia, PA
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant Mercer, NJ
(IN U.S. PLAINTIFF CASES ONLY)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Michael O. Pansini, Esq. Pansini & Mezrow
1525 Locust Street, 15th Floor, Philadelphia, PA 19145
215-732-5555

Attorneys (If Known)
David R. Friedman, Esq. Forry Ullman
150 South Warner Road, Suite 450, King of Prussia, PA 19406
610-977-2975

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☒ 3 Federal Question (U.S. Government Not a Party)
☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|-----------------------------------------|---------------------------------------|----------------------------|---------------------------------------------------------------|----------------------------|---------------------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for Nature of Suit Code Descriptions

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER/STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input checked="" type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutional of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer w/Disabilities - Employment <input type="checkbox"/> 446 Amer w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding ☒ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity)

28 U.S.C. §1332

Brief description of cause

Diversity Jurisdiction & Amount in Excess of \$75,000.00

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions)

JUDGE

DOCKET NUMBER

DATE 5/16/19

SIGNATURE OF ATTORNEY OF RECORD

[Signature]

MAY 20 2019

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG JUDGE

MAY 20 2019

EGSUNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**19****2347****DESIGNATION FORM**

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 2255 South Croskey Street, Philadelphia, PA 19145

Address of Defendant: 31 Winder Avenue, Trenton, NJ 08609

Place of Accident, Incident or Transaction: PA Turnpike SR476, Lower Milford Township, Pennsylvania

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|----------------------------------------|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted aboveDATE: 5/30/19

Attorney-at-Law / Pro Se Plaintiff

76494

Attorney I.D. # (if applicable)

CIVIL: (Place a ✓ in one category only)**A. Federal Question Cases:**

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Patent
- ☐ 6. Labor-Management Relations
- ☐ 7. Civil Rights
- ☐ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☐ 11. All other Federal Question Cases
(Please specify) _____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☒ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify) _____
- ☐ 7. Products Liability
- ☐ 8. Products Liability - Asbestos
- ☐ 9. All other Diversity Cases
(Please specify) _____

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, David R. Friedman, counsel of record or pro se plaintiff, do hereby certify☒ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs.☐ Relief other than monetary damages is sought.DATE: 5/10/19

Attorney-at-Law / Pro Se Plaintiff

MAY 20 2019**76494**

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38

EGS**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA**

GINA SNYDER,

Plaintiff

v.

CBC TRANSPORT, LLC and CIRINEU
FARIAS,*Defendants*

CIVIL ACTION -LAW

NO.

19**2347**

JURY TRIAL DEMANDED

CASE MANAGEMENT TRACK DESIGNATION FORM


In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the Plaintiffs and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. §2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos -- Cases involving claims for personal injury or property damage from Exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.)
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

5/16/19
Date

David R. Friedman, Esquire
Attorney-at-law


Attorney for Defendants

610-977-2975
Telephone

610-977-2980
Fax Number

dfriedman@forryullman.com
E-Mail Address

(Civ. 660) 10/02

MAY 20 2019**MAY 20 2019**

Walnut Hill Plaza | 150 South Warner Road | Suite 450 | King of Prussia PA 19406
PH 610.977.2975 | FX 610.977.2980

Forry|Ullman
Attorneys at Law

DAVID R. FRIEDMAN

DIRECT DIAL: 610-977-4106
E-MAIL: dfriedman@forryullman.com

May 16, 2019

Clerk of Courts
United States District Court
Eastern District of Pennsylvania
601 Market Street
Philadelphia, PA 19106

RE: Gina Snyder v. CBC Transport, LLC and Cirineu Faras
My File No. 604196
Claim #173812148 / Date of Loss: 3/10/17
Docket No. 190203059

To the Clerk:

Please allow this letter to advise that I have been retained by Progressive Insurance to represent CBC Transport, LLC and Cirineu Faras in the above matter.

Enclosed please find an original and two copies of Defendant's Notice of Removal and Disclosure Statement, as well as the following documents:

1. Designation Form
2. Case Management Track Form
3. Check in the amount of \$400.00
4. a CD containing copies of the documents.

*Case Designation
Not signed*

Kindly file the originals, time-stamp the copies and return a copy in the enclosed envelope. Should you have any questions, please give me a call.

Very truly yours,

David R. Friedman

DAVID R. FRIEDMAN

DRF/mc

Encl:

Cc: Michael Pansini, Esquire

MAY 20 2019

Handwritten: #400
EGS

IN THE UNITED STATES DISTRICT COURT FOR THE
 EASTERN DISTRICT OF PENNSYLVANIA

GINA SNYDER,

Plaintiff

v.

CBC TRANSPORT, LLC and CIRINEU
 FARIAS,

Defendants

:
:
:
:
:
:
:

CIVIL ACTION -LAW

NO.

19 2347

JURY TRIAL DEMANDED

NOTICE OF REMOVAL

Defendants, CBC Transport, LLC and Cirineu Farias hereby file the following Notice of Removal, and in support of same states the following:

1. Defendant, Cirineu Farias is an adult individual and is a citizen of Burlington County, New Jersey. Defendant resides at 606 4th Street, Riverside, NJ 08075.
2. Defendant, CBC Transport, LLC is a New Jersey Corporation with its principal place of business located at 31 Winder Avenue, Trenton, NJ 08609. CBC Transport, LLC is a citizen of Mercer County, New Jersey.
3. Plaintiff, Gina Snyder is an adult individual and is a citizen of Philadelphia County, Pennsylvania. Plaintiff resides at 2255 South Croskey Street, Philadelphia, PA 19145.
4. The Plaintiff filed a Complaint against Defendants in the Court of Common Pleas of Philadelphia County, Pennsylvania on February 28, 2019. The Complaint was docketed at Philadelphia County Court of Common Pleas, No. 190203059. See Exhibit "A."
5. In her Complaint, Plaintiff seeks damages for personal injury as a result of a motor vehicle accident on March 10, 2017.
6. In her Complaint, Plaintiff alleges negligence. See Exhibit "A."
7. Plaintiff seeks damages in excess of Fifty Thousand Dollars (\$50,000.00) in the

Complaint. Defendants are covered under a policy of insurance that has a total limit of One Million Dollars (\$1,000,000.00). The amount in controversy exceeds the jurisdictional limit of Seventy-Five Thousand Dollars (\$75,000.00).

8. Defendants are filing this Notice of Removal in that complete diversity of citizenship exists between Plaintiff, a citizen of Pennsylvania, and Defendants, citizens of New Jersey and the amount in controversy is in excess of Seventy-Five Thousand Dollars (\$75,000.00).

9. Removal is timely under U.S.C. § 1446(b) because less than thirty (30) days have elapsed since service of the Complaint on Defendants.

10. Defendants will give written notice of the Plaintiff, as required by 28 U.S.C. § 1416(d).

11. A copy of this Notice will be filed with the Prothonotary of Philadelphia County, as required by 28 U.S.C. 1446 § (d).

FORRY ULLMAN

BY:



DAVID R. FRIEDMAN, ESQUIRE

Attorney I.D. No. 76494

150 South Warner Road, Suite 450

King of Prussia, PA 19406

(P) 610-977-2975 / (F) 610-977-2980

dfriedman@forryullman.com

Dated: 5/16/19

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

GINA SNYDER,	:	
<i>Plaintiff</i>	:	CIVIL ACTION -LAW
	:	
v.	:	
	:	NO.
CBC TRANSPORT, LLC and CIRINEU	:	
FARIAS,	:	
<i>Defendants</i>	:	JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

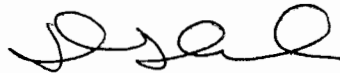
The undersigned hereby certifies that a true and correct copy of Defendants' Notice of Removal was served upon the Plaintiff, by mailing the same to Plaintiff's attorney of record, via First Class United States Mail, postage pre-paid, addressed as follows:

Michael O. Pansini, Esquire
PANSINI & MEZROW
1525 Locust Street, 15th Floor
Philadelphia, PA 19102

This statement is made subject to the penalties of 18 U.S.C. § 1621, relating to perjury.

Respectfully submitted,

FORRY ULLMAN



DAVID R. FRIEDMAN, ESQUIRE
Attorney for Defendants
Attorney I.D. # 76494
150 South Warner Road, Suite 450
King of Prussia, PA 19406
(610) 977-2975

Dated: 5/16/19

03/12/2019 TUE 14:39 FAX

002/011

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

PLAINTIFF'S NAME GINA SNYDER		DEFENDANT'S NAME CBG TRANSPORT, LLC	
PLAINTIFF'S ADDRESS 2255 S. CROSBY STREET PHILADELPHIA PA 19145		DEFENDANT'S ADDRESS 31 WINDER AVENUE TRENTON NJ 08609	
PLAINTIFF'S NAME		DEFENDANT'S NAME CIRINEU FARIAS	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS 606 4TH STREET RIVERSIDE NJ 08075	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NUMBER OF DEFENDANTS 2	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Writ of Habeas Corpus <input type="checkbox"/> Transfer From Other Jurisdiction <input type="checkbox"/> Motion of Appeal	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$30,000.00 or less <input checked="" type="checkbox"/> More than \$30,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Non-Jury <input type="checkbox"/> Other		
CASE TYPE AND CODE 2V - MOTOR VEHICLE ACCIDENT			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		FILED PROTHONOTARY FEB 28 2019 M. BRYANT	
		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>GINA SNYDER</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF/PETITIONER/APPELLANT'S ATTORNEY MICHAEL O. PANSINI		ADDRESS PANSINI & MEEROW 1525 LOCUST ST 15TH FLOOR PHILADELPHIA PA 19102	
PHONE NUMBER (215) 732-5555	FAX NUMBER (215) 732-7872	E-MAIL ADDRESS MPansini@PansiniLaw.com	
SUPREME COURT IDENTIFICATION NO. 44455		DATE SUBMITTED Thursday, February 28, 2019, 02:20 pm	
SIGNATURE OF FILING ATTORNEY OR PARTY MICHAEL PANSINI			

FINAL COPY (Approved by the Prothonotary Clerk)

03/12/2019 TUE 16:40 FAX

0004/011

PANSINI & MEZROW

BY: MICHAEL O. PANSINI, ESQUIRE
 I.D. #44456
 BY: STEVEN M. MEZROW, ESQUIRE
 I.D. #43746
 BY: GREGORY J. KOWALSKI, ESQUIRE
 I.D. #64271

1525 Locust Street, 15th Floor
 Philadelphia, PA 19102
 (215) 732-5555

THIS IS A MAJOR JURY**Attorney for Plaintiff**

GINA SNYDER
 2255 S. Crooksey Street
 Philadelphia, PA 19145

vs.

CBC TRANSPORT, LLC
 31 Winder Avenue
 Trenton, NJ 08609
 and
CIRINEU FARIAS
 606 4th Street
 Riverside, NJ 08075

COURT OF COMMON PLEAS
COUNTY OF PHILADELPHIA

NO,

CIVIL ACTION COMPLAINT
2V - MOTOR VEHICLE

1. Plaintiff, GINA SNYDER, is an adult individual residing at 2255 S. Crooksey Street, Philadelphia, PA 19145.
2. Defendant, CBC TRANSPORT, LLC is a corporation and/or foreign corporation, which at all times relevant hereto engaged in business in Philadelphia County, on a regular, systematic, continuous and substantial basis with offices for service of process at 31 Winder Avenue, Trenton, New Jersey 08609.
3. Defendant, CIRINEU FARIAS, is an adult individual residing at 606 4th Street, Riverside, NJ 08075 with addresses at 7736 33rd Way NE, Lacey, Washington 98516 and 31 Winder Avenue, Trenton, New Jersey 08609.

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4. At all times material hereto, the Defendants, **CBC TRANSPORT, LLC.**, by and through its agents, servants, workmen and/or employees, including **CIRINEU FARIAS**, acting in the course of their employment and within the scope of their authority with the said Defendant and in furtherance of said Defendant's business, owned, operated, maintained, serviced, controlled, supervised, and possessed the tractor trailer involved in the accident hereinafter described.

5. At all times relevant hereto Defendant, **CBC TRANSPORT, LLC.**, was and is in the business of trucking and/or transporting goods.

6. At all times material hereto Defendant, **CBC TRANSPORT, LLC.**, has engaged in a practice of placing corporate profits over public safety to transport products as quickly as possible, putting the safety of motorists second to the financial interests of said Defendant.

7. At all times relevant hereto Defendant, **CBC TRANSPORT, LLC.**, enforced a policy which recklessly disregarded the interests of motorists on the roadway by pressuring that its trucks and drivers deliver products as quickly as possible in reckless disregard of the safety of motorists on the roadway.

8. On or about the 10th day of March, 2017, Defendant, **CIRINEU FARIAS**, while acting in the course of his employment for Defendant, **CBC TRANSPORT, LLC.**, and while acting within the scope of his authority and in furtherance of said Defendant's business, operated, maintained, controlled, and possessed the tractor trailer which was owned, leased or otherwise possessed by Defendant, **CBC TRANSPORT, LLC.**, which was involved in the accident hereinafter described.

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9. On or about the 10th day of March, 2017, Plaintiff, GINA SNYDER, was lawfully operating a motor vehicle which she owned.

10. On the aforesaid date, the Defendant, CBC TRANSPORT, LLC., vehicle was being operated by Defendant, CIRINEU FARIAS on Pennsylvania Turnpike SR476 in Lower Milford Township, Pennsylvania, when it was so carelessly, recklessly, and/or negligently operated and controlled that it was caused to be involved in a crash with the vehicle which Plaintiff, GINA SNYDER, was operating.

11. By reason of the aforesaid carelessness, negligence and recklessness hereinafter described of the Defendant, CBC TRANSPORT, LLC., Plaintiff, GINA SNYDER, suffered severe and permanent injuries to her head, neck, back, hips, arms and legs; she also sustained severe and permanent injuries to the bones, muscles, tendons, ligaments, nerves and tissues of her head, neck, back, hips, arms and legs; including but not limited to post-traumatic headaches, cervical, upper chest and abdomen injuries. The Plaintiff, GINA SNYDER, suffered internal injuries of an unknown nature; she suffered severe aches, pains, mental anxiety and anguish, and a severe shock to her entire nervous system, and other injuries the full extent of which are not yet known. She has in the past and will in the future undergo severe pain and suffering as a result of which she has been in the past and will in the future be unable to attend to her usual duties and occupation, all to her great financial detriment and loss. The Plaintiff, GINA SNYDER, believes and therefore avers that her injuries are permanent in nature.

12. As a result of the aforesaid occurrence, the Plaintiff, GINA SNYDER, has been compelled, in order to effectuate a cure for the aforesaid injuries, to expend large

03/12/2019 TUE 14:41 FAX

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sums of money for medicine and medical attention and may be required to expend additional sums for the same purposes in the future.

13. As a result of the aforesaid occurrence, the Plaintiff, **GINA SNYDER**, has been prevented from attending to her usual and daily activities and duties, and may be so prevented for an indefinite time in the future, all to her great detriment and loss.

14. As a result of the aforesaid occurrence, the Plaintiff, **GINA SNYDER**, has suffered physical pain, mental anguish and humiliation and she may continue to suffer same for an indefinite period of time in the future.

COUNT I
GINA SNYDER V. CBC TRANSPORT, LLC.

15. Plaintiff, **GINA SNYDER**, incorporates by reference and makes a part hereof the preceding paragraphs of this Complaint as though fully set forth herein at length.

16. The carelessness, recklessness, and/or negligence of the Defendant, **CBC TRANSPORT, LLC.**, consisted of the following:

- (a) hiring inexperienced drivers;
- (b) failing to properly maintain said vehicle, including but not limited to the tractor-trailer's safety, drive and brake systems;
- (c) failing to properly perform pre-trip and post-trip inspections of said vehicle including but not limited to inspection of the vehicle's safety, drive and brake systems;
- (d) failing to properly train **CIRINEU FARIAS** in the performance of safety inspections, and the operation and use of said vehicle;
- (e) failing to properly supervise **CIRINEU FARIAS**;

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Defendants, solely, jointly and severally in an amount in excess of Fifty Thousand (\$50,000.00) Dollars but not in excess of Seventy Five Thousand (\$75,000.00) Dollars, plus delay damages, punitive damages, interest, costs, and damages as permitted by law.

COUNT II
GINA SNYDER V. CIRINEU FARIAS

19. Plaintiff, GINA SNYDER, incorporates by reference and makes a part hereof the preceding paragraphs of this Complaint as though fully set forth herein at length.

20. The carelessness, negligence and/or recklessness of Defendant, CIRINEU FARIAS, consisted of the following:

- (a) operating said motor vehicle at an excessive rate of speed under the circumstances;
- (b) failing to have said motor vehicle under proper and adequate control at the time of the accident;
- (c) failing to apply his vehicle's brakes in time to avoid a collision;
- (d) failing to give proper and sufficient warning of the approach of said motor vehicle;
- (e) failing to pay attention while operating said motor vehicle;
- (f) disregarding a steady red traffic signal under the circumstances;
- (g) operating said motor vehicle in a reckless manner without due regard for the rights and safety of those lawfully upon the highway, one of whom was the Plaintiff, GINA SNYDER, at the point aforesaid;
- (h) failing to operate his motor vehicle in a safe and proper manner at the time and location at issue;
- (i) failing to comply with the laws, rules and regulations of

03/12/2019 TUE 16:42 FAX

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the Pennsylvania Motor Vehicle Code, the statutes of the Commonwealth of Pennsylvania and the ordinances of Milford Township;

- (j) violating 75 Pa.C.S.A. §3714 pertaining to careless driving;
- (k) violating 75 Pa.C.S.A. §3735 pertaining to reckless driving; and
- (l) failing to maintain the vehicle such that the rear-brake linings were contaminated by oil.

21. The negligence, carelessness, and/or recklessness of the Defendant, CIRINEU FARIAS, increased the risk of harm to Plaintiff, GINA SNYDER, thereby causing injuries and damages suffered by Plaintiff as set forth above.

22. As a result of the negligence, carelessness, and/or recklessness of the Defendant, CIRINEU FARIAS, the Plaintiff, GINA SNYDER, suffered the injuries and damages as set forth above.

WHEREFORE, Plaintiff, GINA SNYDER, demands judgment against the Defendant, solely, jointly and severally in an amount in excess of Fifty Thousand (\$50,000.00) Dollars but not in excess of Seventy Five Thousand (\$75,000.00) Dollars, plus delay damages, punitive damages, interest, costs, and damages as permitted by law.

Respectfully submitted,

PANSINI & MEZROW

DATE: February 28, 2019

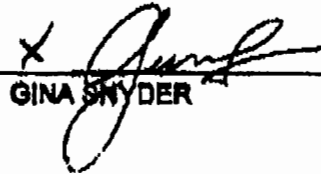
BY: /s/ MICHAEL O. PANSINI
MICHAEL O. PANSINI, ESQUIRE
STEVEN M. MEZROW, ESQUIRE
GREGORY J. KOWALSKI, ESQUIRE
Attorneys for Plaintiff

05/12/2019 TUE 16:42 FAX

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VERIFICATION

I, GINA SNYDER, state that I am the within named Plaintiff and that the facts set forth in the foregoing Civil Action Complaint are true and correct to the best of my knowledge, information and belief; and that this statement is made subject to the penalties of 18 Pa. C.S.A. Section 4904 relating to unsworn falsification to authorities.

X 
GINA SNYDER

DATED: 2/28/19

Case ID: 190203059